

REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 1-6, 8, 9, 11, and 13 are pending in this application. Claims 1, 4, 5, and 13 are independent. The remaining claims depend, directly or indirectly, from claims 1, 4, or 5.

Claim Amendments

Independent claims 1, 4, 5, and 13 have been amended to clarify that (i) a thrusting member is provided on a rear surface of said sheet tray body for frontwardly pushing said sheet tray body when said sheet tray is used *thereby allowing said sheet tray to be retained in an open position* and (ii) that "said back cover is part of a main body of said sheet feeder and is configured to cover at least one internal component of said sheet feeder." Support for these amendments may be found, for example, in Figures 2 and 3 and on p.13, ll. 8-15 of the instant specification.

Rejection(s) under 35 U.S.C § 103

Claims 1-6, 8, 9, 11, and 13 were rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 5,975,520 ("Shim") in view of U.S Patent No. 6,070,868 ("Nagato"). To the extent that the rejection applies to the amended claims, the rejection is respectfully traversed.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to

combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *See* MPEP section 706.02(j).

The Applicant respectfully asserts that the Examiner has not established a *prima facie* case for the referenced application as Shim and Nagato, whether considered separately or in combination, fail to teach or suggest all the claim limitations.

Specifically, the Examiner has admitted that Shim fails to teach an abutting thrusting member (Office Action mailed January 13, 2005, p.2). Further, the Applicant respectfully maintains that Nagato does not teach or suggest a thrusting member *that abuts the back cover* of the sheet feeder as recited in the claims. Specifically, as required by the claim amendments, the back cover is part of the main body of said sheet feeder and is configured to cover at least one internal component of the sheet feeder. In addition, the Applicant respectfully maintains that Nagato does not even teach a sheet feeder having a back cover as recited in the claims.

Moreover, in contrast to the Examiner's position, the main tray disclosed in Nagato is *not* equivalent to the back cover (3 in Figures 2 and 3 of the instant specification) recited in the claims. In particular, the main tray (21) disclosed in Nagato is part of the feed tray and *not* part of the main body of the sheet feeder. Further, as clearly shown in Figure 5 of Nagato, the main tray (21) extends outside the main body of the sheet feeder and does not perform any covering function. In contrast, the back cover (3 in Figures 2 and 3 of the instant specification) is part of the main body of the sheet feeder and performs a covering function (*i.e.*, to cover the print engine, etc. – see instant specification p. 13, ll. 8-15).

Moreover, the thrusting member disclosed in Nagato does not provide a “frontwardly pushing” force as recited in the claims. Specifically, during the operation of the sheet feeder in Nagato, the auxiliary tray is rotably attached to the shaft provided on the main tray. Thus, when the auxiliary tray rotates around the shaft, the ribs abut with the projections on the main tray, thereby allowing the auxiliary tray to be maintained in its open position.

In contrast, when the sheet tray is in its closed position in the claimed invention, the ribs provided on the sheet tray does not abut with the back cover. Therefore, the back cover does not provide a thrusting force to the rib. However, when the sheet tray is in the open position, the rib abuts with the back cover and provides a thrusting force against the sheet tray. Simultaneously, the sheet mounting portion connectively provided on the bottom cover pushes the sheet tray towards the back cover with a force which balances with the thrusting force, *whereby the sheet tray is retained in its opened position* as recited in the claims.

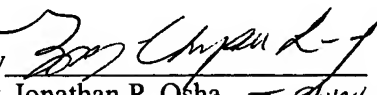
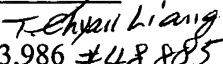
In view of the above, neither Shim nor Nagato, whether viewed separately or in combination, teach or suggest the invention as recited in the independent claim 1. Thus, independent claim 1 is allowable over the cited references. Additionally, the remaining independent claims include similar patentable limitations to independent claim 1, and thus are patentable over the cited references for at least the same reasons. Further, dependent claims are allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 04995/039001).

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Respectfully submitted,

By 
for Jonathan P. Osha 
Registration No.: 33,986 #48,885
OSHA · LIANG LLP
1221 McKinney St., Suite 2800
Houston, Texas 77010
(713) 228-8600
(713) 228-8778 (Fax)
Attorney for Applicant